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United States Department of Justice

United States Attorney Northern District of New York

Gateway Building 14 Durkee Street, Suite 340 Plattsburgh, New York 12901-2998 Tel.: (518) 314-7800 Fax: (518) 314-7811

Via CM/ECF

June 16, 2020

Hon. Thomas J. McAvoy Senior U.S. District Judge Federal Building and U.S. Courthouse 15 Henry Street Binghamton, New York 13901

Re: United States v. Kyle Caton, 1:19-CR-245 (TJM)

Dear Judge McAvoy:

The government respectfully requests a 14-day extension of the deadline to respond to defendant Kyle Caton's motion for compassionate release. To respond to the defendant's motion, the government will need to obtain and review the defendant's health, disciplinary, and progress records from the Bureau of Prisons, and find out more about his efforts, if any, to exhaust administrative remedies. It will not be possible to obtain these records before the current deadline of June 18, 2020.

Thank you for your consideration.

Respectfully submitted,

GRANT C. JAQUITH United States Attorney

By: /s/ Shira Hoffman

Shira Hoffman Assistant United States Attorney

Bar Roll No. 700507